

# Detroit Alliance For Fair Banking

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November 22, 2000

Manager Dissemination Branch  
Information Management and Services Division  
Office of Thrift Supervisor  
1700 G. Street NW  
Washington DC 20552

2000 NOV 28 PM 2:33  
DISSEMINATION BRANCH  
OFFICE OF THRIFT SUPERVISION

ATTENTION DOCKET NO. 2000-94

The Detroit Alliance For Fair Banking (DAFB) and CRA member organization National Community Reinvestment Coalition (NCRC) believes that comprehensive application procedures are critical in order to increase access to capital and credit for traditionally underserved communities.

The Office of Thrift Supervision (OTS) has been among the more rigorous of the federal agencies in reviewing thrift applications. DAFB believes that these proposed changes have elements that can enhance the OTS review process.

You are correct in proposing that portions of financial institutions CRA plans cannot be confidential. DAFB would like to add, that the OTS must require detailed and specific CRA plans in which the applicant describes how its CRA performance will be improved after the merger. This plan must be specific and adequate information relative to the merger. It must include discussions of how the institution will not purchase predatory loans and conduct any business non-beneficial to its depositors.

The public comment period that the OTS proposes that community groups must notify the institution they are giving comment to should not be required. It would be reasonable if that lender wanted information, they should be given the same rights as others, obtain that information as any one else, by written request from the OTS.

The DAFB also would like the OTS to keep CRA requirements in tack. It is imperative that any part of the CRA regulation being dismissed will put it in danger of being dismantled bit by bit. This virtually young regulation has worked and many individuals want to discredit its accomplishments. In the city of Detroit, we utilize our rights in commenting on applications for mergers that we feel do more harm then good for our communities.

We encourage the OTS to consider these comments and those of NCRC that are more detailed.

We are thankful for this opportunity to comment on the Application Procedures and hope that we have been helpful to you in determining what is reasonable and beneficial to the community in which we both serve.

If you have any questions, I can be reached at (313) 894-3325 from 9:00 to 5:00 Monday through Friday.

Sincerely,



Veronica Williams  
Executive Director